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Premium Food Group, Inc. and
Nut Cravings, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

<p>OHIO SECURITY INSURANCE COMPANY,</p> <p>Plaintiff,</p> <p>v.</p> <p>PREMIUM FOOD GROUP, INC. and NUT CRAVINGS, INC.,</p> <p>Defendants.</p>	<p>Case No. 3:21-CV-15690-FLW-LHG</p> <p>DEFENDANTS’ NOTICE OF MOTION TO DISMISS COMPLAINT</p> <p>Date: December 6, 2021 Time: 1:30 p.m.</p> <p><u>Assigned to:</u></p> <p>Chief Judge Freda L. Wolfson</p> <p>Magistrate Judge Lois H. Goodman</p>
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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, on December 6, 2021, at 1:30 p.m. before the Honorable
Lois H. Goodman, Defendants Premium Food Group, Inc., and Nut Cravings Inc. (“Defendants”)

will respectfully move this Court for an order dismissing Plaintiff's Complaint pursuant to Rules 12(b)(2) of the Federal Rules of Civil Procedure.

This Motion is made pursuant to Federal Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction, and is based upon this Notice of Motion, the Memorandum in support thereof, the Declaration of Asher Guttman, all pleadings, records, and documents on file herein, and upon such other evidence, oral and documentary, as may be presented to the Court at or before the hearing on this Motion.

As discussed in the accompanying Memorandum, Defendants are New York corporations with no contacts to New Jersey that would subject them to being haled to New Jersey to defend against this action. Defendants simply sells its products online, including through its own e-commerce website and on Amazon.com ("Amazon")—in all cases, Defendants do not expressly aim any activities at New Jersey. Defendants are not subject to the personal jurisdiction of this Court, and the Complaint should be dismissed.

Respectfully submitted,

Dated: November 1, 2021

TARTER KRINSKY & DROGIN LLP

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